

SHARON KERN

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1 Q What was your role with customers?

2 A They would send the drawings by  
3 e-mail, we would download them, send the bid out.

4 Q And did you ever work with  
5 customers --

6 Strike that.

7 Let's look at a few companies.  
8 Actually, first, before you do that, I want to  
9 ask, I will point you to Exhibit 9. This is the  
10 collective bargaining agreement. This is just a  
11 portion, we can get the whole thing.

12 MR. MILMAN: Is it a signed copy?

13 MR. MOHL: This is not signed.

14 (Whereupon, the requested document  
15 was marked as Plaintiff's Exhibit 9, for  
16 identification, as of this date.)

17 MR. MOHL: This is an excerpt  
18 portion.

19 Q Do you recognize this document,  
20 Mrs. Kern?

21 A Yeah. Yes.

22 Q And to your recollection, did Cool  
23 work with unionized workers?

24 A Cool Sheet Metal?

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1 Q Yes.

2 A Yes.

3 Q Did All Around work with unionized  
4 workers?

5 A Yes.

6 Q Does Allure work with unionized  
7 workers?

8 A No.

9 Q When you were at Cool, you were  
10 subject to a selective bargaining agreement with  
11 respect to how you would use your workers?

12 A Yes.

13 Q You had to use these guys for  
14 certain kinds of jobs based on the CBA?

15 A Right.

16 Q And you were also subject to a  
17 collective bargaining agreement at All Around,  
18 right?

19 A Right.

20 Q Did that govern those kinds of jobs  
21 as well?

22 A I'm not familiar with it, so I'm --

23 Q And did you make any attempt to get  
24 unionized workers at Allure?